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Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RACHEL CALABRESE

Plaintiff,

vs.

SEARS ROEBUCK & CO., a New York
corporation authorized to do business in
Oregon, **SEARS HOLDINGS**
CORPORATION, a Delaware corporation,
and **AIMEE DARDIS**, individual,

Defendants.

Case No. 3:15-cv-02059-MO

**PLAINTIFF'S NOTICE OF
VOLUNTARY DISMISSAL
WITHOUT PREJUDICE**

Plaintiff declares:

1.

Pursuant to Fed. R. Civ. P. 41(a)(1), Plaintiff hereby voluntarily dismisses all claims in the present suit against all Defendants, without prejudice.

2.

In accordance with the requirements of Fed. R. Civ. P. 41(a)(1)(A)(i), Defendant has served neither an Answer nor a Motion for Summary Judgment in the present case.

**PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL
WITHOUT PREJUDICE**

3.

In accordance with the requirements of Fed. R. Civ. P. 41(a)(1)(B), Plaintiff has not previously dismissed any federal or state-court action based on or including any of the same claims as in the present case.

DATED this 1st day of February, 2016.

s/ Talia Y. Stoessel

TALIA Y. STOESSEL, OSB No. 115271
Of Attorneys for Plaintiff